## EXHIBIT B

Index # 26960/06				Purc	hased/File	d: December	r 5, 2006
STATE OF NEW YORK		SUPREM	E COURT			QUEENS	COUNTY
	SB Total	l Transport	Inc.			P	laintiff
		against					
	Seko Worl	dwide LLC	, et al			De	efendant
STATE OF NEW YORK COUNTY OF ALBANY	SS.:						
Diane Koel	hler	, be	ing duly sw	orn, depos	es and say	s: deponent i	is over
the age of eighteen (18) years;	that on	Decembe	er 14, 2006	, at	2:00 pm	_, at the offic	e of the
Secretary of State of the State	of New York in the	ne City of A	Albany, New	York depo	nent serve	d the annexe	ed .
	Summon	s and Verif	fied Compla	int			
							on
	Seko Cu	istoms Bro	kerage, Inc.				, the
Defendant in this action, by del	livering to and lea	aving with		Belinda (	Capers-Ga	rdiner	
AUTHORIZED AGENT in the O	Office of the Secr	etary of St	ate, of the S	State of Ne	v York, per	sonally at the	€
Office of the Secretary of State	of the State of N	lew York,	2tr	ue copies t	hereof and	that at the tir	ne
of making such service, depon	ent paid said Sec	cretary of S	state a fee o	f 40	dollars	; That said se	ervice
was made pursuant to Section							
Deponent further says that dep							
of the Secretary of State of the	State of New Yo	rk, duly au	thorized to a	accept sucl	n service o	n behalf of sa	ıid
defendant.							
Description of the person serve	ed: Approx. Age	e: 40	Appro	x. Wt: <u>18</u>	5 lbs A	Approx. Ht:	5' 9"
Color of skin: Black Ha	ir color: Black	Sex:	Female	Other: _			*****************************
•		Ĭ,				/	
Sworn to before me on this							
18TH day ofDe	ecember, 2006			<del>\</del>			
· · ·			4	- 1			
DONNA M. T	DINGS //			De la company de	7-		·
NOTARY PUBLIC, St No. 01TI4898570, Qualifie	ate of New York	·		1/	⊅iane Ko		Manager er .
Commission Expires				Invoic	e•Work Orde	er# SP06055	22

SERVICO. INC. - PO Box 871 - ALBANY. NEW YORK 12201 - PH 518-463-4179

of which the within is a true copy will be presented

one of the judges of the within named Court, at

Attorney(s) for

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

SB TOTAL TRANSPORT INC.,

Plaintiff,

-against-

DISCOVERY CARGO, INC. and TARGET LOGISTIC BRÖKERAGE, INC., SEKO WORLDWIDE, INC., SEKO WORLDWIDE, LLC, SEKO CUSTOMS SERVICES, a division of TARGET LOGISTICS, INC.,

Defendants.

AFFIDAVIT OF SERVICE

Signature (Rule 130-1.1-a)

Print name beneath Mitchell A. Nathanson

Attorney for THE NATHANISON LAW FIRM LLP

Office and Post Office Address, Telephone 81 HEMPSTEAD AVENUE LYNBROOK, NY 11563

TEL. (516) 568-0000 FAX (516) 568-9456

To

Attorney(s) for

Service of a copy of the within is hereby admitted.

Attorney(s) for

2900 - Blumberg Excelsion Inc., NYC 10013

Index # 26960/06				Purchas	ed/Filed: Decemb	per 5, 2006
STATE OF NEW YORK		SUPREM	E COURT		QUEEN	NS COUNT
	SB Tot	al Transport	· Inc.			Plaintiff
		against				
	Seko Wo	rldwide LLC	, et al			Defendant
STATE OF NEW YORK COUNTY OF ALBANY	SS.:			4		
Diane Koeh	ler	, be	ing duly sworn	ı, deposes aı	nd says: deponer	ıt is over
the age of eighteen (18) years;	that on	Decembe	er 15, 2006	, at2:0	00 pm_, at the of	fice of the
Secretary of State of the State of	of New York in	the City of A	lbany, New Yo	ork deponent	served the anne	xed
	Summor	าร and Verif	ied Complaint			
						on
	Dis	covery Carg	jo, Inc.			, the
Defendant in this action, by deliv	vering to and le	aving with		Donna C	hristie	,
AUTHORIZED AGENT in the O	ffice of the Sec	retary of Sta	ate, of the State	e of New Yo	rk, personally at t	he
Office of the Secretary of State of	of the State of I	New York,	2 true o	copies there	of and that at the	time
of making such service, depone	nt paid said Se	cretary of St	tate a fee of	40 d	lollars; That said	service
was made pursuant to Section		•		-	,	
Deponent further says that depo	nent knew the	person so se	erved as afore	said to be th	e agent in the Of	fice
of the Secretary of State of the S	State of New Yo	rk, duly auth	norized to acce	ept such serv	vice on behalf of	said
defendant.						
Description of the person served	: Approx. Age	:38	Approx. W	/t:145	Approx. Ht:_	5'5"
Color of skin: White Hair	color: Blonde	e_ Sex:_	F C	other:		
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worn to before me on this					1)	Handler was a second of the se
20th day of Dece	ember, 2006	******************************		> /</td <td></td> <td></td>		
PO DO DO DE LA FIDI		(		A		
DONNA M. TIDII NOTARY PUBLIC, State No. 01TI4898570, Qualified ir	of New York			Dia	ne Koehler	
Commission Expires Jur				Invoice•Wor	k Order# SP0605	520

SERVICO. INC. - PO BOX 871 - ALBANY. NEW YORK 12201 - PH 518-463-4179

Index # 26960/06		. F	ourchased/Filed:	ed/Filed: December 5, 2006	
STATE OF NEW YORK	SUPREM	E COURT		QUEENS COUNT	
	SB Total Transport	t Inc.		Plaintiff	
	against				
	Seko Worldwide LLC	; et al		Defendant	
STATE OF NEW YORK COUNTY OF ALBANY	SS.:				
Diane Koehler	, be	eing duly sworn, de <sub>l</sub>	poses and says:	deponent is over	
the age of eighteen (18) years; that	t on Decembe	er 19, 2006 ,	at <u>2:00 pm</u> ,	at the office of the	
Secretary of State of the State of N	lew York in the City of A	Nbany, New York d	eponent served	the annexed	
	Summons and Verif	fied Complaint			
				on	
	Seko Worldwid	de, LLC		, the	
Defendant in this action, by deliveri	ng to and leaving with		Amy Lesch	,	
AUTHORIZED AGENT in the Office	e of the Secretary of Sta	ate, of the State of	New York, perso	onally at the	
Office of the Secretary of State of the	he State of New York,	2 true copie	s thereof and th	at at the time	
of making such service, deponent p	paid said Secretary of S	tate a fee of	10dollars; T	hat said service	
was made pursuant to Section 30	3 Limited Liability Comp	pany Law .			
Deponent further says that deponer	nt knew the person so s	erved as aforesaid	to be the agent	in the Office	
of the Secretary of State of the State	e of New York, duly aut	horized to accept s	uch service on t	ehalf of said	
defendant.			¢		
Description of the person served:	Approx. Age: 23	Approx. Wt:	160 Apr	orox. Ht: 5'9"	
Color of skin: White Hair col	or: Blonde Sex:	F Other	*		
Sworn to before me on this			1		
22nd day of Decemb	ber, 2006				
0. 1					
DONNA M. TIDINGS			Diane Koeh	ler	
NOTARY PUBLIC, State of N No. 01Tl4898570, Qualified in Alb Commission Expires, June 19	bany County	lance	oide Mark Order #		

Index # 26960/06				Purchased	/Filed: December 5, 2006
STATE OF NEW YORK		SUPREME	COURT		QUEENS COUNT
	SB Total	Transport	Inc.		Plaintiff
	a	gainst			
	Seko World	lwide LLC,	et al		Defendant
STATE OF NEW YORK COUNTY OF ALBANY	SS.:				
Diane Koehler		, be	ing duly sworn	, deposes and	says: deponent is over
the age of eighteen (18) years; that	at on	Decembe	r 19, 2006	, at2:00	om_, at the office of the
Secretary of State of the State of I	New York in the	e City₂of Al	lbany, New Yo	rk deponent se	rved the annexed
	Summons	and Verifi	ed Complaint		
					on
Seko Worldwide, Inc.	nka Seko Cus	toms Brok	erage, Inc. sh	a Seko Worldv	vide, Inc, the
Defendant in this action, by deliver	ing to and leav	ving with _		Amy Les	ch,
AUTHORIZED AGENT in the Office	e of the Secre	tary of Sta	te, of the State	e of New York,	personally at the
Office of the Secretary of State of	the State of Ne	ew York,	2 true o	copies thereof a	and that at the time
of making such service, deponent	paid said Secr	etary of St	ate a fee of _	40 doll	ars; That said service
was made pursuant to Section 3	06 Business C	orporation	Law .		
Deponent further says that depone	ent knew the ne	areon eo ea	anved as afore	said to be the s	egent in the Office
of the Secretary of State of the Sta	•				
defendant.	te of few fork	t, duly add	ionzed to acce	spt addit activity	on benan or said
Description of the person served:					Approx. Ht: 5'9"
Color of skin: White Hair co	lor: Blonde	Sex:	F C	ther:	
Sworn to before me on this					1.
22nd day of Decem	nber, 2006				
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D- )	/		$ \triangle$		1
DOŇNA M. TIDING NOTARY PUBLIC, State of	New York		(	Diane	Kdehler
No. 01Tl4898570, Qualified in A Commission Expires June				Invoice•Work (	order # SP0605519

81 HEMPSTEAD AVENUE

LYNBROOK, NY 11563

Office and Post Office Address

BROKERAGE, INC., SEKO WORLDWIDE, INC.,

SEKO WORLDWIDE, LLC, SEKO CUSTOMS

-against-

Plaintiff,

SERVICES, a division of TARGET LOGISTICS, INC., DISCOVERY CARGO, INC. and TARGET LOGISTIC

Defendants.

duly entered in the office of the clerk of the within

PLEASE take notice that the within is a (certified)

Index No.

26960

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

SB TOTAL TRANSPORT INC.,

true copy of a

named court on

THE NATHANSON LAW FIRM LLP

81 HEMPSTEAD AVENUE Office and Post Office Address

LYNBROOK, NY 11563

To

Attorney(s) for

. Case 1:07-cv-03258-VM Dated,

Document 1-5 of which the within is a true copy will be presented PLEASE take notice that an order

for settlement to the Hon.

one of the judges of the within named Court, at

Z

Yours, etc.

Attorney for

NOTICE OF SETTLEMENT

Signature (Rule 130-1.1-a)

AFFIDAVITS OF SERVICE

Print name beneath

Mitchell A. Nathanson

Attorney for

THE NATHANSON LAW FIRM LLP

Office and Post Office Address, Telephone 81 HEMPSTEAD AVENUE LYNBROOK, NY 11563 TEL. (516) 568-0000

FAX (516) 568-9456

To

Attorney(s) for

Dated, Service of a copy of the within is hereby admitted.

2900 - Blumberg Excelsior Inc., NYC 10013

Attorney(s) for

Index # 26960/06		Purchased/Filed: December 5, 2006					
STATE OF NEW YORK		SUPREMI	COURT		QUEENS COUNTY		
	SB T	otal Transport	Inc		Plaintiff		
	02 /	against					
	Seko V	Vorldwide LLC	, et al		Defendant		
STATE OF NEW YORK COUNTY OF ALBANY	<b>SS</b> .:						
Diane Koeh	ler	, be	ing duly swo	rn, deposes and s	says: deponent is over		
the age of eighteen (18) years; t	that on	Decembe	er 14, 2006	, at <u>2:00 p</u>	om_, at the office of the		
Secretary of State of the State of	of New York	in the City of A	lbany, New	York deponent se	rved the annexed		
	Sumr	nons and Verif	ied Complai	nt	90		
					on		
Target Logis	tic Services	, Inc. sued he	rein as Targe	et Logistic Service	the		
Defendant in this action, by deli-	vering to and	d leaving with		Belinda Capers-	Gardiner ,		
AUTHORIZED AGENT in the O	ffice of the S	Secretary of Sta	ate, of the St	ate of New York,	personally at the		
Office of the Secretary of State	of the State	of New York,	2tru	e copies thereof a	and that at the time		
of making such service, depone	nt paid said	Secretary of S	tate a fee of	40dolla	ars; That said service		
was made pursuant to Section	306 Busine	ess Corporation	ı Law				
Deponent further says that depo	onent knew t	the person so s	served as afo	presaid to be the a	agent in the Office		
of the Secretary of State of the	State of New	/ York, duly au	thorized to a	ccept such service	e on behalf of said		
defendant.							
Description of the person served	d: Approx.	Age: 40	Approx	. Wt: 185 lbs	Approx. Ht: 5' 9"		
Color of skin: <u>Black</u> Hair	r color: Bl	ack Sex:	Female	Other:	***************************************		
Sworn to before me on this							
18TH day of Dec	cember, 200	6		\C			
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DONNA M. TIL	DINGS	-	1 2	Mery	Koenler		
NOTARY PUBLIC, Sta No. 01TI4898570, Qualified	te of New York	у					
	in Albany Count	y			Order# SP0605521		

Jo

named court on

true copy of a

Attorney for Yours, etc.
THE NATHANSON LAW FIRM LLP

81 HEMPSTEAD AVENUE Office and Post Office Address LYNBROOK, NY 11563

Attorney(s) for

PLEASE take notice that an order NOTICE OF SETTLEMENT

for settlement to the Hon. of which the within is a true copy will be presented

one of the judges of the within named Court, at

X

Attorney for THE NATHANSON LAW FIRM LLP Yours, etc.

Office and Post Office Address LYNBROOK, NY 11563

81 HEMPSTEAD AVENUE

To

Attorney(s) for

Index No.

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

SB TOTAL TRANSPORTING.,

duly entered in the office of the clerk of the within

PLEASE take notice that the within is a (certified)

-against-

Plaintiff.

SERVICES, a division of TARGET LOGISTICS, INC., DISCOVERY CARGO, INC. and TARGET LOGISTIC SEKO WORLDWIDE, LLC, SEKO CUSTOMS BROKERAGE, INC., SEKO WORLDWIDE, INC.,

Defendants.

AFFIDAVIT OF SERVICE

Signature (Rule 130-1.1-a)

Print name beneath

Mitchell A. Nathanson

THE NATHANISON LAW FIRM LLP

Office and Post Office Address, Telephone 81 HEMPSTEAD AVENUE LYNBROOK, NY 11563 TEL. (516) 568-0000

FAX (516) 568-9456

To

Attorney(s) for

Dated, Service of a copy of the within is hereby admitted.

Attorney(s) for

2900 - Blumberg Excelsior Inc., NYC 10013

# EXHIBIT C

## SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

SB TOTAL TRANSPORT INC.,

Plaintiff.

Index No. 26960/06

-against-

SEKO WORLDWIDE, LLC, SEKO CUSTOMS BROKERAGE, INC., SEKO WORLDWIDE INC., DISCOVERY CARGO, INC. AND TARGET LOGISTIC SERVICES, a division of TARGET LOGISTICS, INC.,

SEKO WORLDWIDE, LLC'S **VERIFIED ANSWER** 

Defendants

Defendants, SEKO Worldwide, LLC, SEKO Customs Brokerage, Inc. and SEKO Worldwide, Inc. (collectively, "SEKO"), by its attorneys Leader & Berkon LLP and Goldberg Kohn Bell Black Rosenbloom & Moritz, Ltd., Answer the Complaint of Plaintiff, SB Total Transport, Inc., as follows:

- 1. SEKO denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Complaint.
- 2. SEKO admits that SEKO Worldwide, LLC is a Delaware limited liability company with its principal place of business located at 1100 Arlington Heights Road, Suite 600, Itasca, Illinois 60143. Except as expressly admitted, SEKO denies the allegations contained in paragraph 2 of the Complaint.
- SEKO admits that SEKO CUSTOM BROKERAGE, INC. and SEKO WORLDWIDE, INC. are Delaware corporations with their principal place of business located at 1100 Arlington Heights Road, Suite 600, Itasca, Illinois 60143. Except as expressly admitted, SEKO denies the allegations contained in paragraph 3 of the Complaint.

- SEKO denies knowledge or information sufficient to form a belief as to 4. the truth of the allegations contained in paragraph 4 of the Complaint.
- SEKO denies knowledge or information sufficient to form a belief as to 5. the truth of the allegations contained in paragraph 5 of the Complaint.

## AS AND FOR SEKO'S ANSWER TO THE FIRST CAUSE OF ACTION

- In response to the allegations contained in paragraph 6 of the Complaint, 6. SEKO hereby repeats and realleges each and every answer to paragraphs 1 through 5 of the Complaint as if they were fully set forth herein.
- SEKO denies that it requested services from Plaintiff at any time prior to 7. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. SEKO denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 7 of the Complaint.
- SEKO denies that it requested services from Plaintiff at any time prior to 8. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. SEKO denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 8 of the Complaint.
- SEKO denies that it requested services from Plaintiff at any time prior to 9. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to

Filed 04/23/2007

Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 9 of the Complaint.

## AS AND FOR SEKO'S ANSWER TO THE SECOND CAUSE OF ACTION

- 10. In response to the allegations contained in paragraph 10 of the Complaint, SEKO hereby repeats and realleges each and every answer to paragraphs 1 through 9 of the Complaint as if they were fully set forth herein.
- 11. SEKO denies that it directed Plaintiff to render periodic statements of account at any time prior to June 1, 2006. Further answering, SEKO denies that, prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf or that SEKO directed Plaintiff to render any services on its behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO admits that Exhibit A appears to be invoices. SEKO denies knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 11 of the Complaint.
- 12. SEKO denies that it requested services from Plaintiff at any time prior to June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 12 of the Complaint.
- June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 13 of the Complaint.

SEKO denies that it requested services from Plaintiff at any time prior to 14. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to

Filed 04/23/2007

### FIRST AFFIRMATIVE DEFENSE

the truth of the remaining allegations contained in paragraph 14 of the Complaint.

The Complaint fails to state a cause of action against SEKO. 15.

### SECOND AFFIRMATIVE DEFENSE

Plaintiff's damages, if any, were caused in whole or in part by individuals 16. or entities other than SEKO, and over whom SEKO had no control or responsibility.

### THIRD AFFIRMATIVE DEFENSE

The Complaint is barred as against SEKO for lack of privity. 17.

## FOURTH AFFIRMATIVE DEFENSE

The Complaint is barred by the Statute of Limitations. 18.



WHEREFORE, SEKO demands judgment dismissing the Complaint against SEKO, awarding costs and disbursements in connection with this action, including reasonable attorneys' fees, and such other and further relief as this Court may deem just and proper.

Dated:

New York, New York

February 5, 2007

LEADER & BERKON LLP

JUDITH A. JOSEPH JENKINS 630 Third Avenue, 17th Floor New York, NY 10017 (212) 486-2400

-and-

William C. Meyers Vanessa B.M. Vergara GOLDBERG KOHN BELL BLACK ROSENBLOOM & MORITZ, LTD. 55 East Monroe Street, Suite 3700 Chicago, IL 60603 (312) 201-4000

Attorneys for Defendants Seko Worldwide LLC, Seko Customs Brokerage, Inc. and Seko Worldwide Inc

Mitchell A. Nathanson, Esq. To: THE NATHANSON LAW FIRM LLP 81 Hempstead Avenue Lynbrook, New York 11563 Attorneys for Plaintiff SB Total Transport Inc.

Case 1:07-cv-03258-VM

## VERIFICATION

I, William J. Wascher, President and CEO of SEKO Worldwide, LLC., under penalties as provided by law pursuant to Article 30-3020 of the New York Code of Civil Procedure, certify that the statements set forth in SEKO Worldwide LLC's Verified Answer to Verified Complaint are true and correct, to the best of my knowledge, information and belief. William / Wascher

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS Index No. 26960-06

SB TOTAL TRANSPORT, INC.,

-againstSEKO WORLDWIDE, LLC, SEKO CUSTOMS BROKERAGE, INC., SEKO WORLDWIDE INC., DISCOVERY CARGO, INC. AND TARGET LOGISTIC SERVICES, a division of TARGET LOGISTICS, INC.,

Defendants.

SEKO WORLDWIDE, LLC'S VERIFIED ANSWER

ATTORNEYS FOR

LEADER & BERKON LLP

NEW YORK, NY 10017

(212) 486-2400

NON-PARTY
MORGAN STANLEY CO. INCORPORATED

Page 18 of 27

# EXHIBIT D

Page 19 of 27

## David Bolton, P.C.

Attorney at Law

666 Old Country Road Suite 509 Garden City, New York 11530 Tel: (516) 222-0600 Fax (516) 222-1110

David Bolton, Esq.

Christopher Hanscom, Esq., Of Counsel

February 1, 2007

## Via Fax:

Mitchell A. Nathanson, Esq. The Nathanson Law Firm 81 Hempstead Avenue Lynbrook, New York 11563

Re:

SB Total Transport Inc. v. Seko Worldwide, et al

Index No.: 26960/06

Dear Mitchell:

This shall confirm that the time for Discovery Cargo, Inc and Target Logistic Services to respond to the Complaint in the action referred to above has been extended up to and including February 5, 2007.

Please sign below to confirm same and fax this letter back to my attention.

Your consideration in this matter is appreciated. Do not hesitate to contact me if you have any questions.

Very truly yours,

Obristopher Hanscom

Accepted and Agreed:

Mitchell A Nathanson

# EXHIBIT E

516-222-1110 Atty & Chis Wonscom

LAW OFFICES

Countryman & McDaniel

MICHAEL S MCDANILLE BYRON E COUNTRYMAN ANDREW D. KEHAGIARASTA CHRISTOPH M. WAHNER

ALSO ADMITTED IN MICHIGAN ROCTOR IN ADMIRALTS

LAX AIRPORT CENTER ELEVENTH FLOOR 5903 WEST CENTURY BOULEVARD LOS ANGELES, CALIFORNIA 90045 TEL (310) 342-6500 FAX (3IQ) 346-8505 E-MAIL: info@cargolaw.com

www.cargolaw.com

9 January 2007

Via facsimile to: 516.568.9456 Mitchell A. Nathanson, Esq. The Nathanson Law Firm LLP 81 Hempstead Avenue Lynbrook, NY 11563

> Re: Target Logistics, Inc. adv. SB Total Transport, Inc.

New York Supreme Court Case No. 26960/06 Our Reference 4809-901 Claim Amount Not Advised

Subject: <u>Acknowledgment</u>

Dear Mr. Nathanson:

I am writing on behalf of Target Logistics, Inc. to acknowledge your letter dated 5 January 2007.

Our client is a publicly traded entity which prefers to resolve disputes by voluntary means. Unfortunately, the subject matter of your action cannot be identified without reviewing the complaint. Accordingly, I would appreciate receiving a copy of the complete lawsuit by return fax -and a suitable time extension for reviewing this matter with an eye toward resolution.

Thank you in advance for this courtesy.

With kind regards,

Countryman & McDaniel

Michael S. McDaniel

MSM/aw



Countryman & Mc Daniel

MICHAEL S. MCDANIELS BYRON E COUNTRYMAN ANDREW D. KEHAGIARASTO CHRISTOPH M. WAHNER

TALSO ADMITTED IN MICHIBAN SHOCKTOR IN ADMIRALTS

LAX AIRPORT CENTER ELEVENTH FLOOR 5933 WEST CENTURY BOULEVARD LOS ANGELES, CALIFORNIA 90045 TEL (310) 342-6500 FAX (3(0) 342-6505 E-MAIL: Info@cargolaw.com

www.cargolaw.com

PAGE

02/03

6 February 2007

Via Facsimile to 516-568-9456 Mitchell A. Nathanson, Esq. The Nathanson Law Firm LLP 81 Hempstead Avenue Lynbrook, NY 11563

Target Logistics, Inc. adv. SB Total Transport, Inc.

New York Supreme Court Case No. 26960/06 Our Reference 4809-901 Claim Amount Not Advised

#### Dear Mr. Nathanson:

I am receipt of a copy of my correspondence regarding our request for dismissal of Target Logistic Services from the above-referenced lawsuit, upon which you had handwritten "no."

We are of course aware Mr. David Bolton of Garden City, New Jersey has assumed the defense of Target Logistic Services. Irrespective of that fact, this firm represents Target Logistic Services Inc. and demands its immediate dismissal based upon the Discovery asset purchase agreement, a copy of the front page of which was previously sent to you.

You are now on notice that Target Logistic Services has no legal responsibility for the debt of Discovery. Your failure to dismiss Target in 5 days shall result in our instruction to Mr. Bolton to proceed with appropriate motions for Target's dismissal to include attorneys' fees and sanctions for the inappropriate and malicious prosecution of Target in this matter.

With kind regards,

Byron E. Countryman

BEC/mp

Countryman & McDaniet

Countryman & McDaniel

Mitchell A. Nathanson, Esq. The Nathanson Law Firm LLP 6 February 2007 Page 2

cc: David Bolton, Esq. David Bolton, P.C.

ce: Chris Coppersmith, President, CEO Target Logistic Services Inc.

# EXHIBIT F

## Nathanson Law Firm L.

81 Hempstead Avenue Lynbrook, NY 11563 (516) 568-0000 Fax (516) 568-9456

Mark Nathanson Mitchell A. Nathanson

mark@nathansonlaw.com mitchell@nathansonlaw.com

Of Counsel: Diane Memmoli

January 5, 2007

### \*Personal & Confidential\*

Discovery Cargo, Inc. 147-10 181st Street Jamaica, NY 11413

Re:

SB Total Transport Inc.

To the Above-Named Defendant:

Please be advised that an action has been commenced against you. Service has been made on the Secretary of State pursuant to BCL §306(b). A copy of the Summons is enclosed in accordance with CPLR 3215(g)4(ii).

Failure to respond within 20 days may result in the entry of a default judgment against you.

Please guide yourself accordingly.

Very truly yours,

MITCHELL A. NATHANSON

MAN/ej Enc.

## THE Nathanson Law Firm LLP

81 Hempstead Avenue Lynbrook, NY 11563 (516) 568-0000 Fax (516) 568-9456

Mark Nathanson

Mitchell A. Nathanson

mark@nathansonlaw.com mitchell@nathansonlaw.com

Of Counsel:
Diane Memmoli

January 5, 2007

## \*Personal & Confidential\*

Target Logistic Services, Inc. 1400 Glenn Curtiss Street Carson, CA 90746

Re: SB Total Transport Inc.

To the Above-Named Defendant:

Please be advised that an action has been commenced against you. Service has been made on the Secretary of State pursuant to BCL §306(b). A copy of the Summons is enclosed in accordance with CPLR 3215(g)4(ii).

Failure to respond within 20 days may result in the entry of a default judgment against you.

Please guide yourself accordingly.

Very truly yours,

MITCHELL A. NATHANSON

MAN/ej Enc.

## THE Nathanson Law Firm LLP

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Mark Nathanson Mitchell A. Nathanson

mark@nathansonlaw.com mitchell@nathansonlaw.com

Of Counsel:
Diane Memmoli

January 5, 2007

#### \*Personal & Confidential\*

Target Logistic Services, a
Division of Target Logistics, Inc.
1400 Glenn Curtiss Street
Carson, CA 90746

Re:

SB Total Transport Inc.

To the Above-Named Defendant:

Please be advised that an action has been commenced against you. Service has been made on the Secretary of State pursuant to BCL §306(b). A copy of the Summons is enclosed in accordance with CPLR 3215(g)4(ii).

Failure to respond within 20 days may result in the entry of a default judgment against you.

Please guide yourself accordingly.

Very truly yours,

MITCHELL A. NATHANSON

MAN/ej Enc.